

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

United States of America,

Plaintiff,

v.

Case No. 18-20075

Honorable Sean F. Cox

D-1 Adam Dean Brown

Defendant.

/

**ORDER STRIKING DOCKET ENTRY NO. 208**

Defendant Adam Dean Brown (“Defendant”) is represented in this action by counsel, John Clark. Nevertheless, acting *pro se*, Defendant filed “Motion For ‘Sean Cox’ To disqualify pursuant to 28 USC 455(A)” (ECF No. 208) on October 5, 2021.

Since Defendant has counsel, Defendant is attempting to proceed in a “hybrid” fashion, both through his counsel and *pro se* by way of his motion. *See McKaskle v. Wiggins*, 465 U.S. 168, 183 (1984). Although the Sixth Amendment guarantees defendants the right to conduct their own defense and even represent themselves, *see Farretta v. California*, the right of self-representation does not include the right to proceed in a hybrid manner. *McKaskle*, 465 U.S. at 183; *see also United States v. Mosely*, 810 F.2d 93, 97-98 (6th Cir. 1987). This Court will not allow Defendant to proceed in a hybrid manner in this action will therefore strike Defendant’s *pro se* submission, Docket Entry No. 208. Defendant may seek relief from this Court through his counsel, John Clark.

Accordingly, **IT IS ORDERED** that Docket Entry No. 208 is hereby **STRICKEN**.

**IT IS SO ORDERED.**

S/Sean F. Cox

Sean F. Cox

United States District Judge

Dated: November 16, 2021